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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON, PORTLAND DIVISION

ANGELA TORRES, an individual,

Plaintiff,

v.

ALIREZA ZAMANIZADEH, a/k/a ALI
ZAMANI, an individual, and ADULT CARE
SEARCH, a foreign non-profit corporation,

Defendants.

Case no.: 3:17-CV-01270-AC

PLAINTIFF'S STATUS REPORT

As requested by Judge Acosta, Plaintiff submits this Status report:

Negotiations to resolve this case ended when Plaintiff's contemporaneous negotiations with adverse parties claiming right to Plaintiff's Bend property – quitclaimed to defendant Adult Care Search (ACS) by defendant Ali Zamani (Zamani), then mortgaged by ACS – ended and those third parties resumed and completed a nonjudicial foreclosure of the Bend property. Plaintiff filed a quiet title action in Deschutes County and received a temporary restraining order (TRO) and is now seeking a preliminary injunction to prevent the third parties from taking

1 possession, encumbering, or selling the Bend property pending resolution of the quiet title action.
2 The preliminary injunction hearing is scheduled for September 26th, 2018.

3 Plaintiff would like to continue abatement of this case to allow resolution of the Bend
4 case and, if necessary add other new defendants and amendment of the complaint in this action
5 to reflect the broader set of facts and issues Plaintiff continues to discover. Defendants should
6 not be harmed by this postponement as they have represented there are minimal funds in the
7 accounts subject to the preliminary injunction in this case, and furthermore the Declaration by
8 Frank Najar of the Department of Justice makes it clear that the funds in dispute originated via
9 the Plaintiff. Defendants also should not be entitled to a speedy resolution as the cause of these
10 separate issues and because they have not responded to Plaintiff's discovery requests.

11 DATED September 24th, 2018

12 **PDX LAW GROUP PC**

13 /s David Richardson
14 David Richardson, OSB 051370
15 david@pdxlawgroup.com
Attorneys for Plaintiff

16 *Served upon defendants by email and U.S.P.S. first class mail, on September 24th, 2018, to: Ali
17 Zamani, 613 SW Elderbrook Place, Portland, OR 97225.*